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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

United States Courts  
Southern District of Texas  
FILED  
*April 26, 2022*

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

v.

ABDULRAHMAN MOHAMMED HAFEDH ALQAYSI

MOHAMMED “MOE” AMER FAISAL AL QAYSI

HAMI JAMSHID a/k/a JAMSHID AHMADZAI

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NO. 4:20-CR-641-S2

**SECOND SUPERSEDING INDICTMENT**

**THE GRAND JURY CHARGES THAT:**

**COUNT ONE**

**(False Statement in Naturalization Application)**

On or about January 14, 2016, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

**ABDULRAHMAN MOHAMMED HAFEDH ALQAYSI,**

did knowingly make a false statement under oath, in a case, proceeding and matter relating to, under, and by virtue of a law of the United States relating to naturalization, citizenship or registry of aliens, to wit: in Part 11, on page thirteen of his Form N-400, Application for Naturalization, defendant, **ABDULRAHMAN MOHAMMED HAFEDH ALQAYSI,** falsely answered “No” when asked if he had “ever been a member of, or in any way associated (*either directly or indirectly*) with . . . A terrorist organization.”

In violation of Title 18, United States Code, Sections 1015(a) and 2.

## **COUNT TWO**

### **(False Statement in Naturalization Application)**

On or about January 14, 2016, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

**ABDULRAHMAN MOHAMMED HAFEDH ALQAYSI,**

did knowingly make a false statement under oath, in a case, proceeding and matter relating to, under, and by virtue of a law of the United States relating to naturalization, citizenship or registry of aliens, to wit: in Part 11, on page fifteen of his Form N-400, Application for Naturalization, defendant **ABDULRAHMAN MOHAMMED HAFEDH ALQAYSI** falsely answered “No” when asked if he were “**ever** a part of any group, or did [he] ever help any group, unit, or organization that used a weapon against any person, or threatened to do so.”

In violation of Title 18, United States Code, Sections 1015(a) and 2.

### **COUNT THREE**

#### **(False Statement in Naturalization Application)**

On or about January 14, 2016 in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

**ABDULRAHMAN MOHAMMED HAFEDH ALQAYSI,**

did knowingly make a false statement under oath, in a case, proceeding and matter relating to, under, and by virtue of a law of the United States relating to naturalization, citizenship or registry of aliens, to wit: in Part 11, on page fifteen of his Form N-400, Application for Naturalization, defendant **ABDULRAHMAN MOHAMMED HAFEDH ALQAYSI** falsely answered “No” when asked if he “**ever** committed, assisted in committing, or attempted to commit, a crime or offense for which you were **not** arrested.”

In violation of Title 18, United States Code, Sections 1015(a) and 2.

## **COUNT FOUR**

### **(Conspiracy to Commit Wire Fraud)**

Beginning on or about the year January 1, 2015, and continuing until on or about March 10, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

**ABDULRAHMAN MOHAMMED HAFEDH ALQAYSI,  
MOHAMMED “MOE” AMER FAISAL AL QAYSI and  
HAMI JAMSHID a/k/a JAMSHID AHMADZAI,**

did knowingly combine, conspire, confederate, and agree with each other and with others, known and unknown to the Grand Jury, to devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations and promises, and in execution of said scheme and artifice, transmit or cause to be transmitted by means of wire in interstate commerce, writings, signs, signals, pictures and sounds for the purpose of executing said scheme or artifice to defraud in violation of Title 18, United States Code, Section 1343.

In violation of Title 18, United States Code, Section 1349.

**COUNT FIVE**

**(Aggravated Identity Theft)**

On or about March 10, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

**ABDULRAHMAN MOHAMMED HAFEDH ALQAYSI,**

defendant herein, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another, that is, the name, address, and credit card numbers of C.P., during and in relation to a violation of 18 U.S.C. § 1349 (Conspiracy to Commit Wire Fraud) knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Sections 1028A(a)(1).

**COUNT SIX**

**(False Statement in Naturalization Application)**

On or about June 12, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

**MOHAMMED “MOE” AMER FAISAL AL QAYSI,**

did knowingly make a false statement under oath, in a case, proceeding and matter relating to, under, and by virtue of a law of the United States relating to naturalization, citizenship or registry of aliens, to wit: in Part 12, on page fourteen of his Form N-400, Application for Naturalization, defendant **MOHAMMED “MOE” AMER FAISAL AL QAYSI** falsely answered “No” when asked if he “**EVER** committed, assisted in committing, or attempted to commit, a crime or offense for which you were **NOT** arrested.”

In violation of Title 18, United States Code, Sections 1015(a) and 2.

**COUNT SEVEN**

**(False Statement in Naturalization Application)**

On or about February 23, 2019, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

**HAMI JAMSHID a/k/a JAMSHID AHMADZAI,**

did knowingly make a false statement under oath, in a case, proceeding and matter relating to, under, and by virtue of a law of the United States relating to naturalization, citizenship or registry of aliens, to wit: in Part 12, on page fourteen of his Form N-400, Application for Naturalization, defendant **HAMI JAMSHID a/k/a JAMSHID AHMADZAI** falsely answered “No” when asked if he “**EVER** committed, assisted in committing, or attempted to commit, a crime or offense for which you were **NOT** arrested.”

In violation of Title 18, United States Code, Sections 1015(a) and 2.

## **COUNT EIGHT**

### **(Procurement of citizenship or naturalization unlawfully)**

From on or about February 23, 2019, to December 11, 2019, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

**HAMI JAMSHID a/k/a JAMSHID AHMADZAI,**

knowingly procured and attempted to procure, contrary to law, his own naturalization, in violation of Title 18, United States Code, Section 1425(a) by making a false statement on his Application for Naturalization, Form N-400, to wit: in Part 12, on page fourteen of his Form N-400, Application for Naturalization, defendant **HAMI JAMSHID f/k/a JAMSHID AHMADZAI** falsely answered “No” when asked if he “**EVER** committed, assisted in committing, or attempted to commit, a crime or offense for which you were **NOT** arrested.”

In violation of Title 18, United States Code, Sections 1425(a) and 2.

**COUNT NINE**

**(Conspiracy to Provide Material Support to a Designated Foreign Terrorist Organization)**

Beginning on or about March 15, 2015, and continuing until on or about December 16, 2020, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

**ABDULRAHMAN MOHAMMED HAFEDH ALQAYSI,**

did unlawfully and knowingly conspire and agree with others known and unknown to provide “material support and resources,” as that term is defined in Title 18, United States Code, Section 2339A(b)(1), including services, to a foreign terrorist organization (FTO), namely the Islamic State of Iraq and al-Sham (ISIS), which at all relevant times has been designated by the Secretary of State as a foreign terrorist organization, pursuant to Section 219 of the Immigration and Nationality Act (“INA”), knowing that ISIS was a designated FTO, and knowing that ISIS had engaged in, and was engaging in, terrorist activity and terrorism.

All in violation of Title 18, United States Code, Sections 2339B.

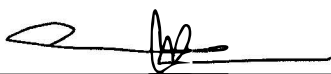
A TRUE BILL

Signature on File

FOREPERSON OF THE GRAND JURY

JENNIFER B. LOWERY  
United States Attorney  
Southern District of Texas

By:



ALAMDAR S. HAMDANI  
Assistant United States Attorney